

LARRY W. LEE (State Bar No. 228175)
DIVERSITY LAW GROUP, A Professional Corporation
444 S. Flower Street
Citigroup Center · Suite 1370
Los Angeles, California 90071
(213) 488-6555
(213) 488-6554 facsimile

SHERRY JUNG (State Bar No. 234406)
LAW OFFICES OF SHERRY JUNG
444 S. Flower Street
Citigroup Center · Suite 1370
Los Angeles, California 90071
(213) 488-6555
(213) 488-6554 facsimile

Attorneys for Plaintiff Stephen Song

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

STEPHEN SONG, as an individual and on
behalf of all others similarly situated,

Plaintiffs,
vs.

KLM GROUP, INC. dba KLM ONSITE
SOLUTIONS, a Pennsylvania corporation;
and DOES 1 through 20, inclusive,

Defendants.

Case No.: 3:10-CV-03583-SC

JOINT STIPULATION RE SHORTENED
NOTICE OF FILING OF UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT

1 Plaintiff Stephen Song ("Plaintiff" or "Song") and Defendant KLM Group, Inc. dba KLM
2 Onsite Solutions ("Defendant" or "KLMr") (collectively referred to as the "Parties") enter into
3 this joint stipulation with reference to the following facts:

4 **RECITALS**

5 A. WHEREAS on the Parties previously reached a proposed class-wide settlement
6 after two settlement conferences with the Hon. Laurel Beeler;

7 B. WHEREAS the Parties have now finalized the class settlement agreement and
8 related documents;

9 C. WHEREAS the Motion for Preliminary Approval of the Class Action Settlement
10 has previously been set for hearing to take place on May 13, 2011 [See Doc. No. 27];

11 D. WHEREAS the Parties have agreed that Plaintiff will file a Motion for
12 Preliminary Approval of Class Settlement ("Motion for Preliminary Approval") on or before
13 April 22, 2011;

14 E. WHEREAS the Parties have agreed that Defendant will not file an opposition to
15 Plaintiff's Motion for Preliminary Approval;

16 F. WHEREAS the Parties have agreed that Plaintiff will not file a reply in support of
17 Plaintiff's Motion for Preliminary Approval; and

18 G. WHEREAS the Parties have agreed to request that the Plaintiff's Motion for
19 Preliminary Approval be filed with the Court on less than the regular notice periods pursuant to
20 the Northern District of California's Local Rules;

21 **STIPULATION**

22 NOW, THEREFORE, it is hereby stipulated by the parties, through their respective
23 counsel of record, as follows:

24 1. The Plaintiff's Motion for Preliminary Approval shall be filed on or before April
25 22, 2011, with a hearing date of May 13, 2011;

26 2. Defendant will not file opposition to Plaintiff's Motion for Preliminary Approval;
27 and
28

1 3. Plaintiff will not file a reply in support of Plaintiff's Motion for Preliminary
2 Approval.

3
4 IT IS SO STIPULATED.
5

6
7 Dated: April 14, 2011

DIVERSITY LAW GROUP

8 By: _____/s/_____
9 Larry W. Lee, Esq.
10 Attorneys for Plaintiff

11 Dated: April 14, 2011

FARELLA BRAUN & MARTEL, LLP

12 By: _____/s/_____
13 Douglas Dexter
14 Attorneys for Defendants

15 I, Larry W. Lee, attest that I have obtained concurrence from Douglas Dexter in the filing
16 of this Stipulation. See N.D. Cal. General Order 45 § 10(B).

ATTACHMENT A

(Counsel for the parties listed on next page)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STEPHEN SONG, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

KLM GROUP, INC. dba KLM ONSITE
SOLUTIONS, a Pennsylvania
corporation; and DOES 1 through 20,
inclusive,

Defendants.

No. 3:10-CV-03583-SC

CLASS ACTION

**[PROPOSED] ORDER GRANTING JOINT
STIPULATION RE SHORTENED NOTICE OF
FILING OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT**

Fed. R. Civ. P. 26(f)
N.D. Cal. Civ. L.R. 16-9

Courtroom: 1
Judge: Hon. Samuel Conti

1 LARRY W. LEE (Cal. State Bar No. 228175)
DANIEL H. CHANG (Cal. State Bar No. 183803)
2 DIVERSITY LAW GROUP, A Professional Corporation
444 S. Flower Street
3 Citigroup Center, Suite 1370
Los Angeles, California 90071
4 Telephone: (213) 488-6555
Facsimile: (213) 488-6554
5 E-mail: lwlee@diversitylaw.com
E-mail: dchang@diversitylaw.com

6 SHERRY JUNG (Cal. State Bar No. 234406)
7 LAW OFFICES OF SHERRY JUNG
444 S. Flower Street
8 Citigroup Center, Suite 1370
Los Angeles, California 90071
9 Telephone: (213) 488-6555
Facsimile: (213) 488-6554
10 E-mail: sherryj23@hotmail.com

11 Attorneys for Plaintiff Stephen Song

12 DOUG DEXTER (State Bar No. 115868)
FARELLA BRAUN + MARTEL LLP
13 Russ Building
235 Montgomery St.
14 San Francisco, CA 94104
15 (415) 954-4400
(415) 954-4480
16 E-mail: ddexter@fbm.com

17 Attorneys for Defendant KLM Group, Inc.

ORDER

The parties having so stipulated, and good cause appearing therefore,

IT IS ORDERED that the Plaintiff's Motion for Preliminary Approval shall be filed on or before April 22, 2011, with a hearing date of May 13, 2011;

IT IS FURTHER ORDERED that Defendant will not file opposition to Plaintiff's Motion for Preliminary Approval and Plaintiff will not file a reply in support of Plaintiff's Motion for Preliminary Approval.

Dated: April 18, 2011.

